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October 28, 2011

VIA FEDERAL EXPRESS

Cal Lundberg, Ph.D., Supervisor
Contaminated Sites Section
Iowa Dep't. of Natural Resources
502 E. 9th St.
Des Moines, Iowa 50319

Re: Electrolux facility - 601 East Central Street, Jefferson, Iowa 50129

Dear Dr. Lundberg:

I am writing to follow up on your conversation the other day with Doug Arnold about the Jefferson property.

We understand that IDNR cannot enroll the property in the Iowa Land Recycling Program at this time because U.S. EPA Region 7 has offered to serve as the lead agency. As Doug explained on the call, Electrolux is in the process of scheduling a meeting with U.S. EPA to discuss the matter and hopefully convince the agency to reconsider its decision. In that event, Electrolux would like to resume the process of enrolling the property in the LRP.

For that reason, we are submitting the enclosed LRP application and fee. We understand that IDNR will take no action on this application until Electrolux resolves the RCRA issue with U.S. EPA.

I will continue to keep you posted. Thank you for your assistance. If you have any questions, please contact me at your convenience.

Very truly yours,

John A. Heer

Enclosures

c: Douglas B. Mechaelsen (w/o encls.)
Douglas S. Arnold, Esq. (w/o encls.)

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Iowa Department of Natural Resources

CASHIERS USE ONLY
0221-542-221A-0570
Organization
Contact Name

LAND RECYCLING PROGRAM ENROLLMENT APPLICATION

Please read the department rule in **Chapter 567 Iowa Administrative Code 137** and read the instructions in **Iowa Land Recycling Program Guidance Document #1** before completing this form.

PART A: Participant Information

Organization: Electrolux Home Products, Inc.	Title: Assistant General Counsel
Contact Name: John A. Heer	Telephone Number: 216-898-2332
Address: 20445 Emerald Parkway, S.W. - Suite 250	Fax Number: 706-447-6266
City, State, Zip: Cleveland, Ohio 44135	E-mail Address: john.heer@electrolux.com

Attachment A1 - Nature of Participation: Pertaining to the participant identified above, describe the reason(s) for participation in this program, legal relationship to the property being enrolled, and the expected role and scope of participation. Include this information as **Attachment A1**.

Attachment A2 - Additional Participants: If there is more than one participant, please attach the above information for each participant and label it as **Attachment A2**.

Attachment A3 - Interested Parties: If there are other interested parties, please identify them and describe their relationship to this project. Include this information and label it as **Attachment A3**.

PART B: Property/Affected Area and Access Information

Property Name: Former Electrolux Manufacturing Facility	
Address/Location: 601 East Central Street	
City and Zip: Jefferson 50129	
County: Greene	
Property Owner (fee title holder): Electrolux Home Products, Inc.	
Property Owner Mailing Address: 20445 Emerald Parkway, S.W. - Suite 250, Cleveland, Ohio 44135	
I, the fee title holder of the property identified in Part B, grant access/control to that property for the purpose of participating in the Iowa Land Recycling Program.	
Signature: <u>Electrolux Home Products, Inc. by John A. Heer</u>	Date: <u>10/26/11</u>

Attachment F3 - Proof of Federal Notification: Submit written proof that the federal regulatory agency, associated with responses to F1 or F2, has been notified regarding the intent to enroll the site in the Iowa Land Recycling Program.

Attach the \$750 application fee payable to the Iowa Department of Natural Resources and mail along with the form to:

Department of Natural Resources
Contaminated Sites
502 E 9th St
Des Moines, IA 50319

Applicant signature: Electrolux Home Products, Inc. Date: 10/26/11
by John A. Lee, Asst. Gen. Counsel

For DNR office use:

Reviewed by: _____	Date: _____
Review Action: <input type="checkbox"/> Approved <input type="checkbox"/> Denied <input type="checkbox"/> Withdrawn	
Explanation attached if denied or withdrawn	

Attachment B1 - Property Access: If access has not been obtained for the property/affected area identified in Part B, please attach an explanation of the efforts taken to obtain access and, if appropriate, the reasons given for refusal. Please label it as **Attachment B1 - Property Access**.

Attachment B2 - Additional Property to be Enrolled: If the affected area is known to extend to properties other than the one identified in Part B, then please attach all the information requested under Part B for those additional properties as **Attachment B2 - Additional Property to be Enrolled**.

PART C: Hazardous Substance Information

Attachment C1 - Condition to be Addressed: Please attach information documenting the environmental condition which is the subject of this enrollment. Please label it as **Attachment C1 - Condition to be Addressed**. For information regarding the contents of this attachment, please consult **Iowa Land Recycling Program Guidance Document #1**.

Attachment C2 - Other Known Contamination: For contamination other than that covered in Attachment C1, which is known and reportable, please attach relevant information as **Attachment C2 - Other Known Contamination**. See the **Iowa Land Recycling Program Guidance Document #1** for further details.

PART D: Historical Information

Attachment D - Historical Information: Please give a general description of the current and historical uses of the property or properties identified in Part B, based on a reasonable and diligent inquiry. Identify known or probable sources and locations of hazardous materials which could reasonably be associated with past land use. Please attach this as **Attachment D - Historical Information**.

PART E: Project Objectives

Attachment E: Please attach a statement of project objectives as **Attachment E**. This should include the following information, insofar as it is known:

- E1 - Current Setting:** A general description of the property and its vicinity, including: current zoning and type of land use (e.g., commercial, industrial, residential).
- E2 - Future Setting:** Planned or probable future uses of the property or its vicinity.
- E3 - Time Table:** Expected time frame for activities reflected in item E2.
- E4 - Estimate of Project Magnitude:** A general description of the nature and magnitude of the environmental contamination to be addressed and the probable means of addressing it.
- E5 - Anticipated Obstacles to Completion:** A description of any foreseeable barriers to achieving project objectives, such as: access to property; financing uncertainties; legal actions; allocation of responsibility among parties; etc.

PART F: Other attachments (Attachments F1 through F3 are required only if applicable.)

Attachment F1 - General Environmental Regulatory Actions and Permits: Attach a list of all known permits or regulatory actions and directives associated with environmental conditions at the site as **Attachment F1 - General Environmental Regulatory Actions and Permits**.

Attachment F2 - Federal Environmental Regulatory Actions: Attach an explanation of any federal regulatory corrective action directives, administrative orders or judicial actions associated with environmental conditions at the site as **Attachment F2 - Federal Environmental Regulatory Actions**.

PART A – PARTICIPANT INFORMATION

ATTACHMENT A1 – Nature of Participation

Electrolux North America, Inc. (Electrolux) requests enrollment into the Land Recycling Program (LRP) to work collaboratively with the Iowa Department of Natural Resources (IDNR) to address chlorinated volatile organic compound (CVOCs) and petroleum-impacted soils and groundwater detected on the property. Electrolux owns the property and will be responsible for performing assessment activities and remedial actions, if needed. The objective of Electrolux's enrollment in the LRP will be to achieve a no further action required certification from IDNR.

ATTACHMENT A2 – Additional Participants

There are no additional participants associated with this property.

ATTACHMENT A3 – Interested Parties

There are no interested parties at this time.

PART B – PROPERTY / AFFECTED AREA AND ACCESS INFORMATION

ATTACHMENT B1 – Property Access

Electrolux owns the property and there are no access limitations.

ATTACHMENT B2 – Additional Property to be Enrolled

There are no additional properties that need to be enrolled in this LRP application.

PART C – HAZARDOUS SUBSTANCE INFORMATION

ATTACHMENT C1 – Condition to be Addressed

During plant closure activities, Electrolux commissioned Golder Associates to assess soil and groundwater conditions exterior of the site building. Golder submitted the samples to a state-certified laboratory for analysis using EPA protocols (SW 846). Golder identified CVOC and petroleum-impacted soils and groundwater at concentrations above IDNR standards. Golder submitted a letter report to IDNR summarizing the subsurface assessment activities, dated May 13, 2011. A summary of the key findings from the letter report includes:

- The Site is underlain by a soft to stiff, light olive gray to gray/dark gray sandy clay, with trace gravel. The sandy clay has intermittent thin (i.e. 0.25 to 1-inch) sand seams to a depth of at least of 30 feet (the deepest boring on Site). Bedrock was not encountered.
- Site groundwater flows to the south. Given the low permeability soils (as evidenced by slow groundwater recharge into Site monitoring wells) and the relatively shallow hydraulic gradient, groundwater flow velocities are expected to be low.
- Golder did not detect any impacted soil along the southern manufacturing boundary.
- Petroleum and CVOC-impacted soil and groundwater appear to be limited to the developed portion of the Site. Golder did not detect any VOCs or petroleum compounds above the MCLs and/or laboratory reporting limits in the groundwater samples collected from the monitoring wells installed along the southern manufacturing boundary of the Site. Agricultural fields, owned by Electrolux, are located south and east of the developed portion of the Site. Because impacted groundwater was not detected along the southern, downgradient manufacturing boundary of the Site and because the soils that underlie the site are low-permeability sandy clays, which limit groundwater flow, it is Golder's opinion that impacted groundwater has not migrated off the property owned by Electrolux.
- Petroleum and CVOC-impacted soil and groundwater are present adjacent to the southern portion of the Site building. Specific sources of the CVOC and petroleum-impacted soils and groundwater have not yet been identified. However, the soil and groundwater impacts are consistent with the materials used in the former manufacturing processes including cutting/machining oils and solvents.

ATTACHMENT C2 – Other Known Contamination

No other contamination is known to be present.

PART D – HISTORICAL INFORMATION

ATTACHMENT D – Historical Information

Electrolux's predecessor, White Consolidated Industries, developed the property in 1960 to manufacture dishwasher motor transmissions. Historical activities at the property included machining, heat treating, metal fabrication, powder coating, warehousing, and testing of washing machine transmissions. Electrolux closed the plant in March 2011 and has since decommissioned and removed the manufacturing equipment and other items from the Site buildings. The property building is scheduled for demolition in November 2011. Prior to development by White Consolidated Industries, the property was used for agricultural purposes.

Site records indicate that Electrolux used five underground storage tanks (USTs), registered with IDNR (registration No.: 198603490), to store petroleum products including cooling oil, used oil, and hydraulic oil. Electrolux closed all five USTs in the mid to late 1980s and 1990. On January 11, 1991, Electrolux received a No Further Action letter from IDNR regarding the UST removal activities performed in 1990.

There was also one solvent AST located in a small building located on the western side of the main Site building, which has been removed.

PART E – PROJECT OBJECTIVES

ATTACHMENT E1 – Current Setting:

The approximately 20.75 acre site is improved by an approximate 75,542 square-foot single-story former manufacturing/office/warehouse building built in 1960, with additions constructed in 1973, 1980, 1988, and 1992. Electrolux closed the plant in March 2011 and has since decommissioned and removed the manufacturing equipment and other items from the Site buildings. The building, located in the northwest corner of the property, is currently vacant and scheduled for demolition later this year (November 2011). The area of the Site formerly used for manufacturing encompasses approximately 40 percent of the property owned by Electrolux. The remainder of the property, south and west of the Site building, is leased for agricultural use.

According to the Greene County Assessor's Office, the Site is currently referenced as Parcel Pin # 11-05-400-007 and is currently serviced by municipal sewer, natural gas (propane tank), electricity, telephone, and municipal water. The building was constructed with a slab-on-grade concrete floor, with sub-grade machine pits and trenches, metal walls, and a metal truss roof.

Properties immediately adjacent to the Site include:

- North: East Central Street and further north, agricultural fields.
- East: Agricultural fields.
- West: A railroad spur servicing a feed grain company located north of the Site and further west, North Cedar Street and residential properties.
- South: Railroad tracks and agricultural fields.

ATTACHMENT E2 – Future Setting

Electrolux will commence demolition of the property buildings in November 2011. Electrolux anticipates leaving the building slab and allowing agricultural activities to continue on the southern and western sides of the property. There are no future plans for development of the property at this time.

ATTACHMENT E3 – Time Table

Demolition activities are anticipated to begin in November 2011 and end in February 2012. Based on the tentative demolition schedule and winter weather conditions, and assuming the acceptance of this LRP application, Electrolux plans to begin any required subsurface environmental assessment work in March or April 2012.

ATTACHMENT E4 – Estimate of Project Magnitude

CVOCs and petroleum compounds (total extractable hydrocarbons as diesel and waste oil) are present on the property at concentrations in excess of IDNR's state standards. CVOCs detected at concentrations above their respective MCLs include:

- Trichloroethene (TCE);
- 1,1,2-dichloroethane;
- 1,1-dichloroethene;
- 1,2-dichloroethane;
- Vinyl chloride;
- Cis-1,2-dichloroethene; and
- Tetrachloroethene (PCE).

Based on our current understanding of site conditions, the CVOC and petroleum-impacted soils and groundwater appear to be limited to the footprint of the buildings and/or immediately adjacent to the buildings. Most of the CVOC and petroleum-impacted soils and groundwater are present below the concrete slab floor and should not be accessible for dermal exposure. There is no evidence that impacted soil and/or groundwater has migrated off-site.

Electrolux plans to perform additional subsurface assessment activities to assess the nature and extent of impacts present on site following building demolition. The probable means of site remediation is source area treatment and/or removal, monitored natural attenuation to address any residual impacts and, if necessary, institution of deed restrictions to prohibit certain property or environmental media (groundwater) uses.

ATTACHMENT E5 – Anticipated Obstacles to Completion

Electrolux does not anticipate any substantial barriers to completion of the LRP process.

PART F – OTHER ATTACHMENTS

ATTACHMENT F1 – General Environmental Regulatory Actions and Permits

Electrolux is not aware of any regulatory actions or directives for the property. The Electrolux Jefferson facility was formerly a small quantity generator (SQG) of hazardous waste under the Resource Conservation and Recovery Act (RCRA). The Jefferson facility was never a large quantity generator or held any treatment, storage, or disposal permits under RCRA or had any other RCRA non-compliance issues or enforcement actions with any regulatory agencies.

ATTACHMENT F2 – Federal Environmental Regulatory Actions

The Electrolux Jefferson site is not subject to any federal regulatory corrective action directives, administrative orders, or judicial actions associated with the environmental conditions at the property.

ATTACHMENT F3 – Proof of Federal Notification

Not applicable. There are no known past actions, corrective action directives, administrative orders, or judicial orders for the property.